

**UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

X CORP., a Nevada corporation,
Plaintiff,

vs.

MEDIA MATTERS FOR AMERICA, a
Washington, D.C. non-profit corporation,
ERIC HANANOKI, and **ANGELO
CARUSONE**,
Defendants.

Case No. 4:23-CV-01175-O

**PLAINTIFF’S MOTION FOR A TEMPORARY RESTRAINING ORDER AND
ANTISUIT INJUNCTION UNDER THE FIRST-TO-FILE RULE**

Plaintiff X Corp. brings this motion for a temporary restraining order and antisuit injunction to prevent Defendants Media Matters for America, Eric Hananoki, and Angelo Carusone from prosecuting their pending suit in the San Francisco Division of the Northern District of California against X, Twitter International Unlimited Company and Twitter Asia Pacific Pte. Ltd. *See Media Matters et al. v. X Corp. et al.*, No. 3:25-cv-02397 (N.D. Cal. Mar. 10, 2025).

For the reasons stated in the accompanying brief in support, Defendants’ suit—filed Monday, March 10, 2025—violates the first-to-file rule, *Save Power Ltd. v. Syntek Fin. Corp.*, 121 F.3d 947, 950 (5th Cir. 1997), and will likely incur duplication of efforts in multiple judicial fora, “rulings that may trench upon authority of sister courts,” and “piecemeal resolution of issues that call for a uniform result.” *Int’l Fid. Ins. Co. v. Sweet Little Mexico Corp.*, 665 F.3d 671, 677-78 (5th Cir. 2011). The Court should promptly issue an antisuit injunction to protect its inherent authority over this matter.

Dated: March 17, 2025.

Respectfully submitted.

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CERTIFICATE OF CONFERENCE

I certify that on March 16, 2025, the parties conferred regarding the issues raised in this motion. In response, Defendants have filed their own motion for a temporary restraining order in the Northern District of California proceedings.

/s/ Christopher D. Hilton
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CERTIFICATE OF SERVICE

I hereby certify that this document was served on all counsel for record on March 17, 2025, via the Court's CM/ECF system.

/s/ Alexander M. Dvorscak
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